

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

OPENAI, INC.,

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LITIGATION

25-md-3143 (SHS) (OTW)

**PLAINTIFFS' MOTION TO SEAL**

This Document Relates To:

All Actions

Under paragraph 21 of the Stipulated Protective Order in the News Cases (*Daily News* Dkt. 129), News and Class Plaintiffs respectfully seek to provisionally file under seal portions of their letter motion regarding disputed issues in the parties' proposed omnibus protective orders. Plaintiffs seek to file portions of their letter motion under seal because exhibits to the letter were designated as Protected Discovery Material by Defendants under the Protective Order. Plaintiffs do not affirmatively seek to seal any material. Under the Protective Order, Defendants have five business days to file a statement of reasons for why the material should be sealed. Plaintiffs will review Defendants' filings, and if necessary, confer about any disagreement.

Dated: June 6, 2025

Respectfully,

/s/ Davida Brook  
Davida Brook  
Susman Godfrey LLP  
News Plaintiffs' Liaison Counsel

/s/ Justin Nelson  
Justin Nelson  
Susman Godfrey LLP  
Lead Class Counsel